

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,
Plaintiff

v.

LEONARDO ALMONTE-RAMIREZ,
Defendant

*
*
*
*
*
*
*
*

CASE NO.: 1:14-cr-00021-JL

ASSENTED TO MOTION TO CONTINUE

Now comes the Defendant in the above-captioned matter, Leonardo Almonte-Ramirez, by and through his attorney, William R. Sullivan, Jr., and hereby requests that this Honorable Court continue the jury trial in this matter now scheduled for December 9, 2014. Defense counsel has spoken with the prosecutor in this matter, Assistant United States Attorney Nick Abramson, who has assented to this continuance.

As reasons for this request, defense counsel states that he is previously scheduled to appear for a jury trial in this Court on a multi-defendant case on December 9, 2014. As such, he will be unable to attend the trial in this matter on that date.

Under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), the time requested in this motion is excludable as the interests of justice served by this requested continuance outweigh the Government's interests. Defense counsel has discussed this issue with the Defendant, who is in agreement to a continuance to accommodate defense counsel's schedule.

Wherefore, the Defendant respectfully requests that the trial in this matter be continued from December 9, 2014 to a later date convenient to the Court. The Assistant U.S. Attorney will

be unavailable during the beginning of January 2015 and as such, the parties request that the trial be scheduled for a date after January 12, 2015.

Date: October 27, 2014

Respectfully submitted,
Defendant,
By his attorney,

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.
SULLIVAN & SULLIVAN
25 Railroad Square, Suite 405
Haverhill, MA 01832
(978) 521-6801
BBO #: 556231

CERTIFICATE OF SERVICE

I, William R. Sullivan, Jr., do hereby certify that the above Assented to Motion to Continue has, on this 27th day of December, 2014, been served on all parties or their attorneys of record via electronic filing.

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.